

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION**

DAVITA M. KEY, )  
Plaintiff, )  
v. ) Civil Action Number:  
DYNAMIC SECURITY, INC., ) 2:19-cv-767-ECM-SMD  
Defendant. )

# PLAINTIFF'S PROPOSED VERDICT FORM

COMES NOW the Plaintiff and files the following proposed jury verdict form:

### **Do you find from a preponderance of the evidence:**

## 1. That Davita Key engaged in protected activity?

Answer Yes or No

If your answer is “No,” this ends your deliberations, and your foreperson should sign and date the last page of this verdict form. If your answer is “Yes,” go to the next question.

2. That Dynamic Security, Inc. took an adverse employment action against Davita Key?

Answer Yes or No \_\_\_\_\_

If your answer is “No,” this ends your deliberations, and your foreperson should sign and date the last page of this verdict form. If your answer is “Yes,” go to the next question.

3. That Dynamic Security took the adverse employment action because of Davita Key’s protected activity?

Answer Yes or No \_\_\_\_\_

If your answer is “No,” this ends your deliberations, and your foreperson should sign and date the last page of this verdict form. If your answer is “Yes,” go to the next question.

4. That Davita Key suffered damages because of the adverse employment action?

Answer Yes or No \_\_\_\_\_

If your answer is “No,” this ends your deliberations, and your foreperson should sign and date the last page of this verdict form. If your answer is “Yes,” go to the next question.

5. That Davita Key should be awarded damages to compensate for a net loss of wages and benefits to the date of your verdict?

Answer Yes or No \_\_\_\_\_

If your answer is “Yes,”  
in what amount? \$ \_\_\_\_\_

6. That Davita Key should be awarded damages to compensate for emotional pain and mental anguish?

Answer Yes or No \_\_\_\_\_

If your answer is “Yes,”  
in what amount? \$ \_\_\_\_\_

If you did not award damages in response to either Question Nos. 5 or 6, this will end your deliberations, and your foreperson should go to the end of this verdict form to sign and date it. If you awarded damages in response to Question Nos. 5 or 6 (or both), go to the next question.

7. That punitive damages should be assessed against Dynamic Security, Inc.?

Answer Yes or No \_\_\_\_\_

If your answer is “Yes,”  
in what amount? \$ \_\_\_\_\_

SO SAY WE ALL.

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Foreperson's Signature

DATE: \_\_\_\_\_

***Taken from Eleventh Circuit Pattern Instructions 4.9 and 4.22***

RESPECTFULLY SUBMITTED BY  
THE ATTORNEYS FOR PLAINTIFF:

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## CERTIFICATE OF SERVICE

I certify that a copy of the foregoing was served on all counsel of record via the Court's electronic filing system on March 26, 2023:

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